

Exhibit B

July 20, 2017

SENT VIA E-MAIL ONLY

Jared Goodman <JaredG@PetaF.org>
James Martin <jmartin@polsinelli.com>

Re: Missouri Primate Foundation, et al v. PETA, et al, Case No. 4:16-cv-02163.

Dear Jared and Jim:

On July 18, 2017, at apparently 8:34 p.m., Jared sent me his letter by e-mail regarding preservation of evidence. I was out of the office then and all day July 19, 2017, but I did review it yesterday, July 19. I am back in the office today, July 20, 2017, and responding to your letter.

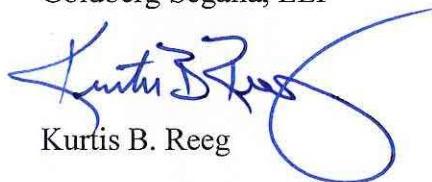
While we appreciate your thoughts regarding preservation, my clients and I think we know what our preservation obligations are and that we have complied with the same. The duty to preserve evidence does not eviscerate certain normal business operations, which even your clients admit with respect to Jane Doe 1 and the transfer of chimpanzee also known as Allie (Doc. 23, ¶47). The same holds true for other animals, such as those referenced in Doc. 23, ¶46. (See also my clients' upcoming responses to Doc. 23, ¶¶ 46 , 47.) The par. 46 transfer was being discussed before either Docs. 1 or 23 were filed. Moreover, that transfer was preceded by an inquiry to the U.S. Fish and Wildlife Service as to whether any permits were required and the Service's response was no. So despite your assertion in footnote 1 on p. 12 of your Doc. 23, we respectfully believe your clients are simply wrong about the legality of the transfers; at a minimum, my clients certainly had a good faith belief that they were not doing anything wrong. Accordingly, we don't view any of the transfers addressed in ¶¶ 45-48 of Doc. 23 to be wrong in any way. It is also noteworthy to mention that while our clients filed their Complaint (Doc. 1) on December 30, 2016, your clients waited approximately 23 weeks to file their answer to Count 1 of the Complaint and almost 27 weeks to raise the preservation issue.

As an officer of the Court I represent to you that I have advised my clients of the content of your preservation letter. I am also happy to discuss preservation issues with you at any time. If you are not satisfied with this explanation and our willingness to talk about the issue, then I feel confident that you will raise the matter with the Court at which time we will be happy, willing and able to present our position to the Court. We appreciate your consideration. Thank you.

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Very truly yours,
Goldberg Segalla, LLP


Kurtis B. Reeg